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Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S MOTION  
FOR RECONSIDERATION OF ORDER  
GRANTING IN PART AND DENYING IN  
PART ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL (DKT. 2237)**

19 the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC's Motion for  
7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under  
8 Seal (Dkt. 2237) ("Motion for Reconsideration"). The Motion for Reconsideration seeks an order  
9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Plaintiff's Responses and Objections to Ten Interrogatories Elected  
11 Pursuant to Order Granting in Part Motion to Compel Interrogatory Responses, Dkt. 1173 (Nos. 26,  
12 28, 29-34, 48-49) (previously filed as Exhibit 1 at Dkt. 1434-6 ) highlighted in green on pages 4-9, 25-  
13 28, 32, 34-35, and 39-42 of the sealed version filed concurrently herewith as Exhibit A either  
14 explicitly disclose Waymo's asserted trade secrets or detailed technical and supplier information from  
15 which key aspects of the asserted trade secrets could be inferred. I understand that public disclosure  
16 of these portions could destroy Waymo's asserted trade secrets. In addition, the portions highlighted  
17 in green on pages 14, 24, and 45-46 of the sealed version filed concurrently herewith as Exhibit A  
18 disclose detailed financial projections, compensation information, and valuation information. I  
19 understand that public disclosure of such detailed financial information could enable Waymo's  
20 competitors to unfairly tailor their investment and recruiting efforts based on Waymo's confidential  
21 financial projections, compensation of its engineers, and valuations of the company as a whole, which  
22 would cause Waymo significant competitive harm.

23 4. The portions of the August 18, 2017 30(b)(6) Deposition Transcript of Eric Meyhofer  
24 (previously filed as Exhibit 2 at Dkt. 1374-6) marked in red boxes in the sealed version filed  
25 concurrently herewith as Exhibit B (specifically, at deposition pages and lines 162:11,14-18; 163:1,4;  
26 164:1; and 167:2-3,11-12) contain detailed technical and supplier information misappropriated by  
27 Defendants and from which key aspects of at least Trade Secret Nos. 25 and 90 could be inferred. I  
28

1 understand that public disclosure of these portions could destroy at least Waymo's Trade Secret Nos.  
2 25 and 90.

3 5. The portions of Uber's compilation of deposition transcripts (previously filed as  
4 Exhibit 3 at Dkt. 1374-8) marked in red boxes in the sealed version filed concurrently herewith as  
5 Exhibit C<sup>1</sup> contain detailed technical and supplier information misappropriated by Defendants and  
6 from which key aspects of at least Trade Secret Nos. 9, 14, 90, and 96 could be inferred. I understand  
7 that public disclosure of these portions could destroy at least Waymo's Trade Secret Nos. 9, 14, 90,  
8 and 96.

9 6. The portions of the July 26, 2017 Deposition Transcript of Jennifer Haroon (previously  
10 filed as Exhibit 3 at Dkt. 1291-6) marked in red boxes in the sealed version filed concurrently  
11 herewith as Exhibit D (specifically, at deposition pages and lines 210:13-14, 212:1-12, 212:21-25,  
12 213:1, 213:5-14, 213:21-23) disclose detailed financial projections, compensation information, and  
13 valuation information. I understand that public disclosure of such detailed financial information could  
14 enable competitors to unfairly tailor their investment efforts based on Waymo's confidential financial  
15 valuations of the company as a whole based on confidential competitive analyses, which would cause  
16 Waymo significant competitive harm.

17 7. The portions of Anthony Levandowski's June 17, 2015 Project Chauffeur Bonus  
18 Statement used as Deposition Exhibit 1085 (previously filed as Exhibit 9 at Dkt. 1278-17) marked in  
19 red boxes in the sealed version filed concurrently herewith as Exhibit E contain financial  
20 compensation details. I understand that public disclosure of such detailed financial information could  
21 enable competitors to unfairly tailor their recruiting efforts based on Waymo's confidential  
22 compensation of its engineers, which would cause Waymo significant competitive harm.

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24 <sup>1</sup> Specifically, at the following deposition pages and lines: 4/17 Boehmke at 35:4-5,17;  
25 36:15,19; 40:1; 43:24-25; 8/4 Gruver at 250:1-4,6-9; 251:23-25; 359:6,12-15,24; 5/4 Haslim at  
26 280:24-25; 4/14 Kshirsagar at 34:3; 35:18; 36:1; 6/14 Pennecot at 202:10; and 8/15 Schwarz at  
27 179:5-7,11-16,23; 182:3,7,17; 183:2-5,12-13,19-22.

